

JOSEPH & KIRSCHENBAUM LLP  
ATTORNEYS

June 5, 2020

**VIA ECF**

Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: Cuturic v. The Jade Farm, *et al.*  
No. 20 CV 3363 (LGS)

Dear Judge Schofield:

We represent Plaintiff Admir Cuturic in the above-referenced matter. We submit this letter to request an adjournment of the Initial Conference, currently scheduled for June 18, 2020 at 10:50 a.m., and an extension of time to file a Joint Case Management Plan and Scheduling Order. Plaintiff requests that the Initial Conference be adjourned until a date following the deadline for Defendants to submit their Answer. Plaintiff has not made any prior requests for adjournment.

Plaintiff has been in communication with attorney Andrew Staulcup, purporting to be Defendants' counsel, since February 2020. On May 19, 2020 Plaintiff emailed Mr. Staulcup the Summons, Complaint and proposed Waiver of Service. Despite months (pre-litigation and after the litigation commenced) of substantive communications with us regarding Plaintiff's claims against his clients, Mr. Staulcup has refused to accept service on their behalf. Accordingly, we sent the Summons/Complaint out for service yesterday. We ask that the Court reschedule the Initial Conference once the Complaint is served, which we anticipate will be shortly.

Respectfully Submitted,

JOSEPH and KIRSCHENBAUM LLP  
/s/ D. Maimon Kirschenbaum  
D. Maimon Kirschenbaum  
*Attorneys for Plaintiff*

cc: Andrew Staulcup, Esq. (via email)